

## Message

**From:** Villamizar, Nicole [Villamizar.Nicole@epa.gov]  
**Sent:** 7/1/2016 3:16:09 PM  
**To:** Carusiello, Chris [Carusiello.Chris@epa.gov]; Janjic, Ksenija [Janjic.Ksenija@epa.gov]; Mooney, Charlotte [Mooney.Charlotte@epa.gov]  
**CC:** Chow, Rita [Chow.Rita@epa.gov]; Reddoor, Marlene [Reddoor.Marlene@epa.gov]; Vance, Ronald [Vance.Ronald@epa.gov]; Grist, Terry [Grist.Terry@epa.gov]  
**Subject:** RE: Issue with CPG Supplier Directory and Rubber Playground Surfacing made from recycled tires

Chris has pulled together some additional information (see below), and Charlotte would like us to meet to discuss this more next week. I'll find a time on our calendars to set something up since it's a short week. Thank you Marlene for raising this issue.

From Chris:

Yes, it was back in October that Rita had asked me to look on the CPGs for playground surfaces to see if there was any more information clarifying the type of playground surfaces the Agency meant by in this category. What I was able to find is in line with Marlene; there isn't too much in the final rule, technical background documents, or RMANS on distinctions between the types of "playground surfaces" or what is meant by one, other than the percentage of recycled content used. Apparently EPA looked at 20 manufacturers/distributors for playground surfaces and four companies for running tracks. There is no distinction made by the kinds of products produced other than the fact that they are all "playground surfaces." Browsing through the CPG Product Supplier List for Park & Recreation I found companies that offered both the ground cover (rubber mulch & chunks) as well as mat-surfaces.

That is true, Nicole, at that time playgrounds and mulch/mats were outside the scope of the study, but now they are included in CPSC's scope of the study which has a two-year timeline.

One thing to note, however, is that according to the Recycled Rubber Council, [Ex. 6 Personal Privacy (PP)] is one of the "Top 9" tire re-processors supplying more than 95% of the total market of crumb rubber. This doesn't exclude them from making other products that are included in the CPGs, however. Also to note is that [Ex. 6 Personal Privacy (PP)] (also one of the Top 9), and [Ex. 6 Personal Privacy (PP)] is included in the category of "Playground Surface and Running Tracks."

Nicole L. Villamizar  
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-----Original Message-----

From: Villamizar, Nicole  
Sent: Friday, July 01, 2016 7:21 AM  
To: Carusiello, Chris <Carusiello.Chris@epa.gov>; Janjic, Ksenija <Janjic.Ksenija@epa.gov>; Mooney, Charlotte <Mooney.Charlotte@epa.gov>  
Cc: Chow, Rita <Chow.Rita@epa.gov>; Reddoor, Marlene <Reddoor.Marlene@epa.gov>; Vance, Ronald <Vance.Ronald@epa.gov>; Grist, Terry <Grist.Terry@epa.gov>  
Subject: Re: Issue with CPG Supplier Directory and Rubber Playground Surfacing made from recycled tires

Hi Marlene:

Thanks for your message. I remember several months ago when the tire crumb issue was gaining lots of media attention, we put something together on the CPG issue, perhaps it was Chris who researched it, and if I recall correctly, came to the same conclusions as you. I believe we provided some background info to ORD on it as well, and I'll look through my files.

# Ex. 5 Deliberative Process (DP)

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Chris/Charlotte/others, thoughts?

Nicole Villamizar

> On Jun 30, 2016, at 6:34 PM, Villamizar, Nicole <Villamizar.Nicole@epa.gov> wrote:  
>  
> FYI  
>  
> Nicole Villamizar  
>  
>  
> Begin forwarded message:  
>  
> From: "Reddoor, Marlene"  
> <Reddoor.Marlene@epa.gov<mailto:Reddoor.Marlene@epa.gov>>  
> To: "Mooney, Charlotte"  
> <Mooney.Charlotte@epa.gov<mailto:Mooney.Charlotte@epa.gov>>, "Vance,  
> Ronald" <Vance.Ronald@epa.gov<mailto:Vance.Ronald@epa.gov>>, "Grist,  
> Terry" <Grist.Terry@epa.gov<mailto:Grist.Terry@epa.gov>>  
> Cc: "Villamizar, Nicole"  
> <Villamizar.Nicole@epa.gov<mailto:Villamizar.Nicole@epa.gov>>  
> Subject: Issue with CPG Supplier Directory and Rubber Playground  
> Surfacing made from recycled tires  
>  
> ALL: CPG issue.  
>  
> Attachments: CPG documentation from Background documents, Granuband  
> manufactured products  
>  
> June 28, we received an email from **Ex. 6 Personal Privacy (PP)** a manufacturer who uses 100% recycled car,  
truck and tractor tires for horse footing, cattle footing, Synthetic Turf Infill (pour in asphalt rubber  
paving) for mats and playground surfaces, playground mulch, and landscape mulch of various sizes from  
3/8" to 1" pieces. The synthetic turf infill, pour in place mats use 10-20mm pieces of asphalt rubber  
paving.  
>  
> They requested to be placed on our CPG Supplier Directory for the 3/8"-3/4" playground mulch, ASTM  
certified.  
> Playground surfaces made with tires and other recycled rubber was  
> promulgated as a CPG product in CPG I, in and proposed Questions and Issues:  
>  
> 1. Issue 1 – Do we define playground surface as solid or pieces of mulch, or both?

## Ex. 5 Deliberative Process (DP)

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>  
> 2. Issue 2 – Beneficial Use of Recycled Tires: Can we actually promote and add a vendor to our  
directory when we are looking into the health effects of using recycled tire material and the reports on  
ill effects have been surfacing all over?

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

> We can meet and discuss this and reach a decision or you can just answer this email.

>

>

> Marlene R.RedDoor

> Reddoor.marlene@epa.gov<mailto:Reddoor.marlene@epa.gov>

> 703-308-7276

> USEPA Office of Resource Conservation and Recovery

> 1200 Pennsylvania Ave, NW (MC:5306P)

> Washington, DC 20460

>

> Web site: [www.epa.gov/fgc](http://www.epa.gov/fgc)<<http://www.epa.gov/fgc>>

> [www.epa.gov/cpg](http://www.epa.gov/cpg)<<http://www.epa.gov/cpg>>

>

> visiting or delivery address:

> 2777 S. Crystal Drive

> 6th Floor - #6937

> Arlington, VA 22202

>

> Ex. 6 Personal Privacy (PP) [tirerubber.pdf](#)>